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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No. 2:11-CR-434-LDG-(PAL)
)	
Plaintiff,)	Stipulated Motion to Continue Discovery
)	
v.)	(Eighth Request)
)	
EDUARD PETROIU, <i>et. al.</i> ,)	
)	
Defendants.)	
)	

COME NOW the parties and stipulate and jointly move this Court to continue the discovery cut-off in the above-captioned case until September 30, 2017. This is the parties' eighth stipulated request for an extension of time. This Court granted a 30-day extension on June 29, 2017.

After conducting extensive discovery, the parties have engaged in negotiations and have agreed, in principle, and in an unsigned writing, to settle this matter for an agreed amount. One of the claimants in this matter, Atanas Nedyalkov, is on the road as a long-range trucker and cannot sign the settlement agreement until he returns. In the meantime, the parties have an obligation to file a settlement agreement with this Court by August 31, 2017. Government

1 counsel has already reduced the terms of the settlement to writing and has delivered that written
2 agreement to Claimants' counsel for Claimant's execution; and they have agreed to settlement on
3 the terms outlined in that agreement.

4 Once Mr. Nedyalkov has returned to the city, both he and his wife (Mariya Nedyalkova,
5 the other petitioner) will sign the settlement agreement, which will then be presented to this
6 Court for final action and final disposition of this matter.

7 Claimants' counsel, Boris Avramski, has consented to this motion for extension of time.

8 Given the foregoing, the parties have agreed to request that this Court extend the
9 discovery cut-off deadline in this matter until September 30, 2017.

10 This motion is not submitted solely for the purpose of delay or for any other improper
11 purpose.

12 WHEREFORE, the parties move this Court to grant a continuance of the discovery cut-
13 off date until September 30, 2017, for the parties to formally finalize the terms of settlement of
14 this matter.

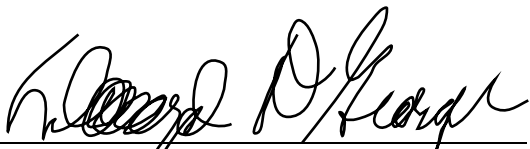
15 Dated this 31st day of August, 2017.

16
17 Respectfully submitted,

18 STEVEN W. MYHRE
19 Acting United States Attorney

20 /s/Michael A. Humphreys
21 MICHAEL A. HUMPHREYS

22
23 IT IS SO ORDERED:

24
25 
26 UNITED STATES DISTRICT JUDGE
LLOYD D. GEORGE
DATED: September 2017